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## Florida Department of Envir

Northeast District • Suite B200, 7825 Baymeadows Way • Jacksonville, Florida 32256-7577

Lawton Chiles, Governor

Carol M. Browner, Secretary

July 24, 1992

Captain Charles R. Cramer  
U.S. Naval Air Station - Jacksonville  
Box 5  
Jacksonville, Florida 32212

Dear Captain Cramer:

U.S. Naval Air Station - Jacksonville  
FL6 170 024 412  
Duval County - Hazardous Waste  
HF 16-144281

The Department has completed the review of quarterly compliance monitoring reports dated May 1991, August 1991, and November 1991, for the polishing pond and domestic waste sludge drying beds. Also, the radiological parameter certificate of analysis dated December 6, 1991, has been reviewed. Please consider following comments in future sampling and reporting to avoid recurrence of these problems.

A. May 1991 Monitoring Report:

1. 2-ethoxyethanol is not analyzed.
2. Holding time exceeded for sulfate, nitrate, fluoride, chloride, sulfide and cyanide samples from several monitoring wells.
3. QA protocol is missing in the lab report for monitoring wells 41-1, 41-2, 41-3, 41-5, 41-6 and 41-8. It is not possible to determine whether or not holding times were exceeded on any parameters.
4. Detection limit for several parameters is higher than permit standards. Especially, it is not due to matrix interference.
5. There are numerous discrepancies between the tabulized data in Table 2 and Lab Reports. For example, nickel, mercury, chloride, 1,2-dichlorobenzene.
6. No units for Radium 228 were included in Table 2.

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7. Section 5-2, page 13, shows that organics have been detected in the deep aquifer for both units; however, none were detected in November 1990. More wells will be needed to determine the extent of contamination.

B. August 1991 Monitoring Report:

1. Toluene Permit Standard, Table 3, reported as "NA".
2. Chloroform Permit Standard, Table 3, listed as 1 ug/l; previously it has been 10 ug/l.
3. Units used in Table 2 for 2,4-D and 2,4,5-TP (Silvex) are mg/l rather than ug/l.
4. 2-ethoxyethanol is still not quantified.
5. Radiologicals for MW 41-1 were not included in the lab report; however, MW 41-9 was listed twice. Table 2 gives values for 41-1.
6. Section 4.1, page 9. Gross alpha/beta are out of compliance for MW 41-1.
7. Section 4.2, page 9. Well MW 41-6 should be included in the list of shallow wells in violation of turbidity.
8. Field Activity Daily Log, May 7, 1991, has a list of monitoring wells and corresponding values, but no explanation of what the values are.
9. There are numerous discrepancies between the tabulized data in Table 2 and 3 and Lab Reports.
10. In Table 3, carbon tetrachloride appears twice, once with a permit standard of 2 ug/l, once with a permit standard of 3 ug/l. In the Lab Report, it was analyzed for only once.

C. November 1991 Monitoring Report:

1. Units for Radium 226 and Radium 228 were omitted in Tables 2 and 3.
2. The permit standards for lindane, 2,4-D, and 2,4,5-TP in Tables 2 and 3 are incorrect.
3. The permit standard for toxaphene in Table 3 is incorrect.
4. Holding times for TOX were exceeded.

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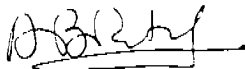
5. There are numerous discrepancies between the tabulized data in Table 2 and Lab Report.
6. The report states that groundwater flow direction in the shallow aquifer has changed due to installation of dewatering wells. If the direction of flow and the shape of the plume have changed, how can the shape of the plume be characterized as the report has done?
7. The dewatering has apparently disturbed the contaminant plume at the Polishing Pond. Previously the plume flow had been northeast; this event the plume could not be discerned.

D. Radiological Parameter Certificate of Analysis:

1. Gross Alpha/Gross Beta results are missing on well 41-1, and Radium 226 and Radium 228 results are missing on well 42-6. These wells are required to be tested for these parameters in Specific Condition II.8.d. The August, 1991 Quarterly Compliance Monitoring Report indicated that this was due to laboratory instrument failure, and that the samples would be re-analyzed. To date, there has been no follow-up.
2. There are numerous discrepancies between the tabulized data in Table 2 and 3 and Lab Reports.

If you have any questions regarding this letter, please contact me at the letterhead address or call (904) 448-4320 ext. 340.

Sincerely,



Ashwin B. Patel  
Hazardous Waste Supervisor

ABP:psN

cc: Jim Schroeder  
Alan Farmer  
Satish Kastury  
Eric Nuzie